

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AMERITAS LIFE INSURANCE CORP.,

Plaintiff,

v.

WILMINGTON SAVINGS FUND SOCIETY,
FSB, SOLELY AS SECURITIES
INTERMEDIARY,

Defendant.

C.A. No. 23-236-GBW

JURY TRIAL DEMANDED

MOTION TO COMPEL PRODUCTION OF AMERITAS'S DEPOSITION TRANSCRIPTS

Defendant Wilmington Savings Fund Society, FSB, solely as Securities Intermediary ("Securities Intermediary"), by and through its undersigned counsel, moves for entry of an order compelling Ameritas to produce deposition transcripts of Ameritas or Ameritas's current or former employees in the following cases: (1) *Wells Fargo Bank, N.A. v. Ameritas Life Insurance Corp.*, No. 4:21-cv-03118-SMB-JMD (D. Neb.); (2) *Ameritas Life Insurance Corp. v. Wilmington Trust, N.A.*, No. 2:19-cv-18713-MEF-MAH (D.N.J.); (3) *Ameritas Life Insurance Corp. v. Wilmington Trust, N.A.*, No. 1:22-cv-00910-JLH (D. Del.); (4) *Ameritas Life Insurance Corp. v. Wilmington Trust, N.A.*, No. 1:22-cv-00907-JLH (D. Del.); and (5) *Wilmington Trust National Association v. Ameritas Life Insurance Corp.*, No. 1:23-cv-02097-VMC (N.D. Ga.).

Dated: June 13, 2024

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